

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6307CR-DIMITROULEAS

UNITED STATES OF AMERICA,
Plaintiff,

vs.

VALERIE ENRIQUE and
AIRBAGS EXPRESS, INC.
Defendant(s).

FILED
TO NOV 20 PM 5:57
CLARENCE J. GIBSON
CLERK U.S. DISTRICT COURT
S.D. OF FL.

MOTION FOR CONTINUANCE

COMES NOW the Defendants Valerie Enrique and Airbags Express, Inc., through counsel undersigned and makes this Motion for Continuance and as grounds would state the following:

1. This matter is scheduled for Calendar Call on December 1, 2000 with a two-week trial calendar beginning December 4, 2000.
2. That due to the recent deaths in the family, the undersigned has a pre-planned, pre-paid trip to Europe from November 27, 2000 through December 1, 2000.
3. The undersigned is meeting with the Government next week to review discovery in this matter for the first time.
4. That the undersigned has conferred with Thomas Watts-Fitzgerald, Assistant United States Attorney, who has indicated that he has no objection to continuance of more than thirty days due to his vacation scheduled from December 15, 2000 through December 22, 2000.

WHEREFORE the Defendant request this Motion be granted.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to Thomas Watts-Fitzgerald, Esq., Office of the United States Attorney, 99 N.E. 4th Street, Miami, Florida 33132, this 16th day of November, 2000.

HADDAD & HESTER, P.A.
One Financial Plaza, Suite 2612
Fort Lauderdale, Florida 33394
[954] 467-6767

By:

FRED HADDAD
Florida Bar No. 180891

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